

September 2, 2009

Leon C. Heron, Jr  
Managing Partner  
Corpus Development, L.P.  
PO Box 241  
Thompson Station, TN 37179

Re: Access to property near Falcon Refinery Site

Dear Mr. Heron:

This letter is provided to answer your questions about NORCO's request to perform soil sampling on your property in Ingleside, Texas. Each of your questions will be addressed in the order they were requested.

**a) What action is NORCO planning to take based upon the results of this sampling?**

NORCO is in the process of performing soil, groundwater, sediment and surface water sampling to determine if there have been environmental impacts from the former Falcon Refinery that present an unacceptable risk to human or ecological health. Based on the results of the sampling a risk assessment will be performed, which will either indicate that there is no unacceptable or if there is environmental risk then cleanup activities may be required.

**b) Has any other sampling taken place within the proximity of the Falcon Refinery with the last five years? If so, what was the purpose of the sampling and what were the results?**

Yes, sampling was performed from November 2007 to January 2008. The purpose of the sampling was to meet the data quality objectives of the Remedial Investigation / Feasibility Study (RI/FS). Results of the sampling indicated additional samples were required that to meet the statistical data quality objectives for the site.

**c) Are there specific contaminants of pollutants for which the sampling is being accomplished?**

Samples are being analyzed for volatile organic compounds, semi-volatile organic compounds, metals, PCBs, pesticides and herbicides. Compounds detected at the site are consistent with the operation of a refinery.

- d) Regarding damages which might arise from the sampling effort, what are the limits of you insurance policies and will Corpus Development be an additional insured?**

There is \$1 million insurance policy in effect for damages and typically for the type of sampling that we are performing there isn't an issuance of an additional insured policy. The sampling on your property will be shallow and will use a XXXX. When the sampling is completed there will be no evidence that sampling was performed.

- e) What damage claims have Kleinfelder and/or NORCO had in the last five years?**

Kleinfelder is a large corporation with over 70 offices in the US.